

David E. Hardin (0066415)
Attorney for Andrea Ngo

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ANDREA L. NGO,	:	CASE NO. : C-1-00-961
Plaintiff,	:	
vs.	:	Judge Watson
THE CITY OF CINCINNATI, et al.,	:	PLAINTIFF'S INITIAL DISCLOSURES
Defendants.	:	PURSUANT TO RULE 26

I. INITIAL DISCLOSURES

A. Name, Address and Telephone Number of Persons Having Discoverable Information:

1. Andrea Ngo
1697 Atson Lane
Cincinnati, Ohio 45205
2. Beverly Head
1600 Gest Street
Cincinnati, Ohio 45204
3. Tara Williams
1600 Gest Street
Cincinnati, Ohio 45204
4. Ty Gouda
1600 Gest Street
Cincinnati, Ohio 45204
5. Tim O'Kane
1600 Gest Street
Cincinnati, Ohio 45204

6. Louise Schramm
1600 Gest Street
Cincinnati, Ohio 45204
7. Kathy Gordon Jackson
c/o Cincinnati Water Works
4747 Spring Grove Avenue
Cincinnati, Ohio 45232
8. Debby Newman
1600 Gest Street
Cincinnati, Ohio 45204
9. Gerald Beverly
1600 Gest Street
Cincinnati, Ohio 45204
10. Michael Nalley
c/o City of Cincinnati
801 Plum Street
Cincinnati, Ohio 45202
11. Ben Cohee
1600 Gest Street
Cincinnati, Ohio 45204
12. Dennis Madden
1600 Gest Street
Cincinnati, Ohio 45204
13. Robert Hill
1600 Gest Street
Cincinnati, Ohio 45204
14. Annie Sierra
1600 Gest Street
Cincinnati, Ohio 45204
15. Dante Raneses, M.D.
5944 Colerain Avenue
Cincinnati, Ohio 45239

B. Documents, Date Compilations and Tangible Things

A copy of all documents in the possession of the Plaintiff relating to her claims are available to Defendant upon formal request. Plaintiff will forward medical records to opposing counsel as they become available.

C. Computation of Damages

Plaintiff is still treating with her treating psychiatrist, Dr. Raneses. Further, she lost wages during the operative time period, including at least four Absent without Leave (AWOL). The true computation of lost wages will also take into account promotions she has lost due to alleged discriminatory treatment. These figures will be determined as additional discovery is obtained.

D. Insurance Agreement

None

II. DISCLOSURE OF EXPERT TESTIMONY

A. Identities of Experts

Dante Raneses, M.D., 5944 Colerain Avenue, Cincinnati, Ohio 45239

III. PRE-TRIAL DISCLOSURES

A. Witnesses

It is not anticipated any witnesses will be called by the Plaintiff other than those identified in I.A. of these disclosures. However, counsel for Plaintiff reserves the right to supplement this list if additional persons become known who have knowledge or information concerning any issue joined herein.

B. Deposition Testimony

Dr. Raneses will testify by deposition.

C. Identification of Documents or Exhibits

It is not anticipated any documents or exhibits will be used other than those previously

identified above. Counsel for Plaintiff reserves the right to supplement this list of exhibits/documents in the event additional documents/exhibits are produced during the course of discovery.

Respectfully submitted,

/s/ David E. Hardin

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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2004, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system which will send notification of such filing to Augustine Giglio, Assistant City Solicitor.

/s/ David E. Hardin

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